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8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA, ) No. CR 18-179 EMC  
13 Plaintiff, )  
14 v. ) STIPULATION AND [PROPOSED]  
15 CHRISHAWN BEAL ET AL., ) ORDER CONTINUING MATTER AND  
16 Defendants. ) EXCLUDING TIME UNDER THE  
17 ) SPEEDY TRIAL ACT  
17 ) Date: August 7, 2018, to September 5, 2018

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18 The parties appeared before the Honorable Edward M. Chen on August 7, 2018, for a status  
19 conference. The government represented that to date it has produced more than 100 pages of discovery,  
20 photographs, body worn camera footage, and additional discovery to the defendants. The government  
21 also represented that it would be producing additional body worn camera footage and that it would seek  
22 a protective order to cover some of the body worn camera footage because the footage contains witness  
23 statements. The defense represented that would need time to review and analyze discovery.  
24 Accordingly, the parties requested, and the Court granted, a continuance until September 5, 2018, for  
25 further status. Further, the Court designated the case as complex. The parties also stipulated, and the  
26 Court ordered, that time between August 7, 2018, and September 5, 2018, be excluded for effective  
27 preparation of counsel pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii) & (iv).

28 STIP. AND PROPOSED ORD. CONT. & EXCL. TIME UNDER S.T.A.

CR 18-179 EMC

1       The parties further stipulate, and ask the Court to find, that the requested continuance and  
2 exclusion of time are in the interests of justice and outweigh the best interest of the public and the  
3 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

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5 SO STIPULATED.

6 DATED: August 9, 2018

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ALEX G. TSE  
United States Attorney

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CHRISTIAAN H. HIGHSMITH  
9 Assistant United States Attorney

10 DATED: August 9, 2018

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/s/  
MARTIN SABELLI  
Counsel for Defendant Chrishawn Beal

/s/  
DENA MARIE YOUNG  
Counsel for Defendant Jaray Day-Shawn Simmons

/s/  
ADAM PENNELL  
Counsel for Defendant Ledarrell Javon Crockett

/s/  
KENNETH WINE  
Counsel for Defendant Melvin Lamont Corbin

/s/  
ROBERT WAGGENER  
Counsel for Defendant Nakia Jones

/s/  
SARA ELLEN RIEF  
Counsel for Defendant Siddiq Jafar Abdullah

/s/  
MICHAEL STEPANIAN  
Counsel for Defendant Romello Shamar Jones

/s/  
EDWARD SWANSON  
Counsel for Defendant Jade Lafay Johnson

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2 [PROPOSED] ORDER

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4 For the reasons stated, this matter is continued until September 5, 2018 at 1:45 p.m. for a status  
5 conference. The time between August 7, 2018, and September 5, 2018, is excluded from the running of  
6 the speedy trial clock for effective preparation of counsel under 18 U.S.C. § 3161(h)(7)(B)(ii) & (iv).  
7 Failure to grant the continuance would deny the defendant's counsel the reasonable time necessary to  
8 prepare, taking into account the exercise of due diligence.

9 IT IS SO ORDERED.

10 DATED: \_\_\_\_\_ 8/9/18

